



Received

MAR 08 2010  
Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 3, 2010

**CERTIFIED MAIL: 7007 0710 0000 2160 7235**

Uri Papish  
Air Quality Program  
Oregon Department of Environmental Quality  
811 SW Sixth Avenue  
Portland, OR 97204

File \_\_\_\_\_  
Enf/comp \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

**Re: Georgia-Pacific Consumer Products LP Wauna Mill  
Boiler MACT 112(j) Part 2 Request for Additional Extension**

Dear Mr. Papish:

As you know, the U.S. Court of Appeals for the D.C. Circuit vacated and remanded the federal Boiler MACT rule (40 CFR Part 63, Subpart DDDDD) in its entirety in a June 8, 2007 decision (made effective in the Court's July 30, 2007 mandate). U.S. Environmental Protection Agency (EPA) is working to re-promulgate the rule, which requires it first to properly categorize and distinguish boilers and process heaters under Clean Air Act (CAA) section 112 from solid waste incinerators under CAA section 129.

Under cover of a letter dated August 24, 2009 to the Oregon Department of Environmental Quality (ODEQ), GP's Wauna Mill requested an extension to submit a Clean Air Act section 112(j) "MACT Hammer" Part 2 Application. In a letter dated August 28, 2009, ODEQ granted an extension until March 15, 2010.

In a letter dated March 1, 2010, ODEQ provided an update on the Part 2 "MACT Hammer" application process. According to ODEQ's letter, the United States Environmental Protection Agency (EPA) recently informed ODEQ that it was in the process of revising the rules governing the Clean Air Act section 112(j) ("MACT Hammer"). The new rules will reportedly clarify which requirements apply when a rule has been vacated, and establish new application procedures. In addition, ODEQ has been informed that EPA is on schedule to propose a new Boiler MACT rule this April and finalize it in time to meet a December 2010 court ordered deadline.

For the reasons set out above and in ODEQ's March 2 letter, the Wauna Mill hereby respectfully requests an additional extension until March 15, 2011 to submit a Part 2 application pursuant to 40 CFR 63.1(a)(12) and 63.9(i), as incorporated by Oregon at OAR 340-244-0210(2).

We respectfully request ODEQ's decision on this additional extension of the Part 2 deadline by March 10, 2010.

If you have any questions about this letter, please feel free to call Mike Crawford on my staff at (503) 455-3233.

Sincerely,



Michael D. Tompkins  
Vice President / Mill Manager

c: Nancy Helm, EPA Region X  
George Davis, ODEQ NW Region; Air Quality Division  
Alan Stinchfield, Georgia-Pacific Corporation

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AUG 28 2009

Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

August 24, 2009

**CERTIFIED MAIL: 7008 1830 0004 3404 5708**

Gerald Ebersole  
Oregon Department of Environmental Quality  
811 SW Sixth Avenue  
Portland, OR 97204

**Re: Georgia-Pacific Consumer Products LP Wauna Mill  
Boiler MACT 112(j) Part 2 Request for Further Extension**

Dear Mr. Ebersole:

As you know, the U.S. Court of Appeals for the D.C. Circuit vacated and remanded the federal Boiler MACT rule (40 CFR Part 63, Subpart DDDDD) in its entirety in a June 8, 2007 decision (made effective in the Court's July 30, 2007 mandate). U.S. Environmental Protection Agency (EPA) is working to re-promulgate the rule, which requires it first to properly categorize and distinguish boilers and process heaters under Clean Air Act (CAA) section 112 from solid waste incinerators under CAA section 129.

Under cover of a letter dated January 23, 2009 to the Oregon Department of Environmental Quality (ODEQ), GP's Wauna Mill requested a six-month extension to submit a "MACT Hammer" Part 2 Application. The reasons GP gave for the extension included the fact that, at the time of our request, EPA was required by court order to issue a proposed rule by July 2009 and a final rule by July 2010. The extension was necessary in part to allow GP time to consider EPA's proposed rule and factor it into the Part 2 application. In a letter dated March 19, 2009, ODEQ granted an extension until September 15, 2009.

On June 30, 2009, the court order was amended, changing the EPA proposal deadline to September 15, 2009. EPA is in the process of gathering available stack emissions and fuel data for the affected sources, and to fill data gaps, EPA has sent CAA section 114 letters requiring stack emission and fuel testing at selected facilities. The test results are due to EPA by October 15, 2009. We

would expect it will take at least several months for EPA to review the test results and incorporate the information into its final rulemaking.

Georgia-Pacific hereby respectfully requests an additional extension through March 15, 2010 to submit a Part 2 application pursuant to 40 CFR 63.1(a)(12) and 63.9(i), as incorporated by Oregon at OAR 340-244-0210(2), for the reasons given above.

In light of the September 15 deadline that would otherwise apply, we respectfully request ODEQ's decision on this additional extension of the Part 2 deadline by September 4, 2009.

If you have any questions about this letter, please feel free to call Mike Crawford on my staff at (503) 455-3233.

Sincerely,



Michael D. Tompkins  
Vice President / Mill Manager

c: Nancy Helm, EPA Region X  
George Davis, ODEQ NW Region; Air Quality Division  
Alan Stinchfield, Georgia-Pacific

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**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 13, 2009

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

Received

MAR 23 2009

Office Of Air, Waste  
And Toxics

**RE: 2008 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. We are submitting this report prior to March 15, 2009, as required in the Air Operating Permit 04-0004, condition 155.

The report consists of the following sections, as required by condition 156:

Annual records of production	Annual records of the amount of fuel used
Hours of Operation	Excess emissions upset log
Emission Fee calculations	
Second semi-annual compliance certification covering the period July 1 through December 31, 2008.	

As a conservative measure, we are certifying to "intermittent" (as opposed to "continuous") compliance for a small number of permit conditions where the mill arguably deviated in some way from the technical/literal requirements in a particular permit condition while remaining in compliance with permit and regulatory requirements. One example of this is those permit conditions requiring that NCG gases be collected and treated under the Cluster Rule; while there were a number of NCG venting events during the reporting period in which NCG gases were vented, which we have reported to DEQ in various periodic reports, we remained in compliance with the permit and underlying regulatory requirements because these "deviations" were caused by SSM or other excusable conditions or were within specific regulatory allowances for excess emissions (e.g., the 1%/4% excess emissions allowances under 40 CFR Part 63, Subpart S). Other examples include monitoring conditions where we may have had monitor downtime or monitoring data outside established ranges for small periods of time, but all such downtime or parameter excursions were within permit and regulatory allowances. By certifying to "intermittent" compliance for such conditions, we are not admitting or certifying to noncompliance; rather, we are just acknowledging that there were

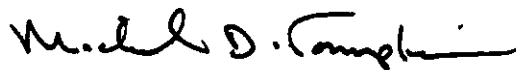
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"deviations". As EPA has often stated, "deviations" are not the same thing as "violations" of applicable requirements, and a certification of intermittent compliance does not necessarily mean and should not be taken to suggest that there were periods of noncompliance. (see 62 Fed. Reg. 54937 (Oct. 22, 1997) and 68 Fed. Reg. 38518 (June 27, 2003)).

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,



Michael D. Tompkins  
Vice President / Mill Manager

Encl.

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprtnq Req 80